

III. REMARKS

1. Claims 1-6, 8, 9 and 20 are proposed to be amended. Claims 16 and 18 are amended to correct typographical errors that do not narrow or limit the scope of the claims and are not made for reasons related to patentability.

2. Claims 1-6 and 8-20 are not anticipated by Dimitrova under 35 U.S.C. §102(b).

The claims are amended to clarify what Applicant means by the term "reference plane."

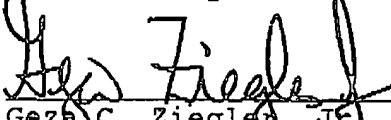
In the present invention, the "reference plane" is the ground for determining an object position and described by using "zone description" and a "camera model." The reference plane should be predefined for each of the video contents to be searched. By using a predefined reference plane, planes other than the image plane, e.g. a soccer field in the real world in a video sequence of a soccer game, can be used as the reference plane.

On the other hand, the Examiner seems to apply "reference plane" as a general term. In Dimitrova, to which the Examiner refers, the coordinate system that is used to describe an object position is limited to the coordinate system set on the image plane. Dimitrova does not have the concept of camera. Therefore, it cannot describe the relationship between the image plane and the real world. This means that a video database system that implements Dimitrova cannot provide ways to retrieve video scenes based on positions of objects in the real works. This is obvious because it uses motion vectors in an MPEG video sequence to describe motion of an object and because it does not mention camera models at all.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 50-0510.

Respectfully submitted,


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29 July 2004
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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being transmitted by facsimile to (703) 872-9306 on the date indicated below.

Date: July 29, 2004

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